

EXHIBIT B

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December 5, 2005

John K. Vigliotti, Esq.
Reardon, Joyce & Akerson, P.C.
397 Grove Street
Worcester, MA 01605

Re: November 14, 2005 Request for additional documents

Dear Attorney Vigliotti:

The purpose of this letter is respond to your letter dated November 14, 2005 and to the additional documents you requested on Terri Pechner-James. Below is our response to your numbered request.

1. Eric Keroack, M.D.: Enclosed is a "To Whom It May Concern" letter dated April 3, 2001 and a Letter to Chief Colannino dated June 15, 2001. We have no office notes or records generated during treatment sessions." Enclosed also is a letter and a release that this office has sent to Dr. Keroack.
2. Susan P. Rudman, Ed. D. Enclosed is a copy of a letter and release that this office has sent to her office. We have no copy of therapy or office notes.
3. Dr Barry, Stoneham: Dr. Barry, 290 Main Street, Stoneham, MA was the City of Revere's psychologist during the period of the Plaintiff's employment. He may still be the City's psychologist. When the Plaintiff, Terri Pechner-James, met with Chief Colannino to address issues of sexual harassment, he gave her Dr. Barry's number and asked her to contact him. The Plaintiff met with Dr. Barry on January 6, 2000 and December 6, 1999. We have no records from this provider. It is not clear, if you need the Plaintiff's release since he is the City's psychologist. We can provide it, if needed.
4. Dr. Elizabeth Miller: The Plaintiff's main treating physician is Dr. Deborah Wald. Enclosed a seven (7) pages with dates ranging from May 2001 to July 2001.

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5. Dr. Dominiak did question the Plaintiff about providers outside of Massachusetts. The Plaintiff did not develop a relationship with a provider outside of Massachusetts. Post Traumatic Stress Disorder does not require intense treatment when the affected person is far away from the environment that caused the trauma. The Plaintiff remained under the care of Dr. Keroack during this period.

6. Any counseling the Plaintiff received through work would have been through Dr. Barry described in the answer to question 3.

7. Dr. Farrell appears to be a physician at M. G.H. We have no time, date or record of the earlier GI evaluation.

8. Dr. Dominiak referenced hypothyroidism in his report. Dr. Keroack also referenced hypothyroidism in his report. We have already provided you with both of these reports. Dr. Pietro Andres in a report dated 8-6-98 diagnosed the Plaintiff with Irritable Bowel Syndrome- a symptom of stress. In regard to hypothyroidism, he stated as follows: "Her thyroid exam was normal without masses or nodules. Laboratory Values: She has a recent thyroid screen which showed TSH low at .14. the remainder of her thyroid function with a free T4 of 6.2 and a free thyroxine index of 6.6. Her total T3 was 116. Her CBC was normal" He stated that it is possible that the low TSH she has a component of hypothyroidism. See Enclosed report No.8.

9. Motor Vehicle Accident with rib fracture: The Plaintiff was involved in a motor vehicle accident while in the course of her employment. The accident took place on March 13, 1998. Below are all the documents that we have on the motor vehicle accident.

1.Date of accident 3-14-98; Date of Accident report 3-15-98. Emergency Room Whidden Memorial- 6 pages.

2. Discharge Instructions from Whidden Memorial

3. 3-30 -98 Worknotes from M.G.H.

4. 3-20-98 M.G.H. Healthcare Center, Revere-Physical therapy for back pain.

5. 4-2-98 M.G.H. Healthcare Center, Revere-Back strain

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6. 4-22-99 M. G. H. Radiological consultation- Right Rib X-ray –No evidence of rib fracture or pneumothorax.
7. 4.22-99 M.G.H Progress Notes, Wald M.D. Ribs still sore.
8. 5-5-99 M.G.H Radiological consultation-Bone Scan-Persistent pain.
9. 5-25-99 M.G.H Rib Injury-followup unrevealing, Wald, M.D.
10. 7-13-99 Chronic Right upper chest wall pain. Letter to Douglas Mathisen, M.D. from Ahmed, M.D.
11. 7-29-99 Followup on chest wall pain. Wald, M.D.
12. 8-6-99 Chronic right upper chest wall pain. Letter to Douglas Mathisen, M.D. from Ahmed, M.D.
13. 8-19-99 Chronic right upper wall pain. Wald, M.D. Plan to try epidural.
14. 9-15-99 Chronic pain right upper chest wall. Letter to Mathisen, M.D. from Ahmed, M.D. Paravertebral spinal nerve injection.

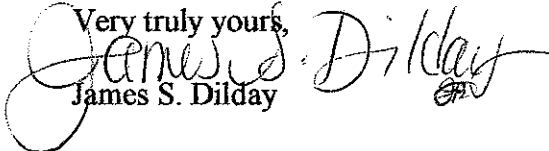
10. On October 22-99, the report notes that the right ovary contains a cyst which measures 3 cm in diameter. On 12-27-99 the follow-up report notes a possible referral to GYN but no date, time or referral physician was identified in that report.

11. We have already provided your office, the City of Revere, the Retirement Board and previous counsel with copies of the records submitted to PERAC for Ms. Pechner-James disability retirement. We will provide you with another copy of said records as soon as they have been copied.

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12. We have also enclosed the following documents:

8-14-97	MGH Migraine Headache
7-17-01	MGH Migraine Headache
5-30-00	MGH Major Depression/Anxiety
5-26-00	MGH Revere Health-Lots of stress, no sleep, Harassment at work.
6-23-00	MGH Depression/Anxiety

Very truly yours,

James S. Dilday